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June 27, 2018

**MEMO ENDORSED**

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**VIA ECF**

The Honorable Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Chevron Corp. v. Donziger, et al.*, Case No. 11 Civ. 0691 (LAK)

Dear Judge Kaplan:

I respectfully write as co-counsel for Chevron to inquire whether, consistent with Your Honor's practice at the underlying trial of this matter, we may at the June 28, 2018 evidentiary hearing (a) enter into evidence as the direct testimony of Lee Grinberg his March 5, 2018 Declaration (with exhibits) (previously filed herein as Document 1967-2 on March 19, 2018) and (b) have Mr. Grinberg in court that day and available for any cross-examination by Mr. Donziger.

Respectfully,

/s/ Herbert J. Stern

Herbert J. Stern

cc: All Counsel of Record (via ECF)

*The direct examination  
shall be addressed orally.*  
SO ORDERED  
*Lewis A. Kaplan, USDJ*  
6/27/18